Date: October 6, 2025

Via Email and U.S. Mail
The Honorable Senator Mark Finchem
Chairman, Joint Legislative Audit Committee (JLAC)
Arizona State Legislature
1700 W. Washington St.
Phoenix, AZ 85007

Re: Request for Independent Review, Audit, and Criminal Referral Determination into The Arizona Commission on Judicial Conduct and Maricopa County Superior Court Judge Charlene D. Jackson

Dear Chairman and Members of the Joint Legislative Audit Committee,

I am writing to respectfully request the initiation of an independent investigation and comprehensive performance audit into the operations and conduct of the **Arizona Commission on Judicial Conduct** (the "Commission") and the actions of **Maricopa County Superior Court Judge Charlene D. Jackson**.

Testimony and evidence presented during The Joint Legislative Ad Hoc Committee on Family Court Orders meetings, coupled with court records and formal complaints, indicate severe systemic failures within the Commission that demand immediate review to ensure compliance with its Constitutional and Statutory mandates.

Given the gravity and verifiable nature of the allegations herein—which include potential criminal conduct, a constitutional breach of separation of powers, and the misuse of public resources—I request that your office initiate an immediate inquiry into the Commission's process and response to complaints to ensure judicial accountability, protect the public, and to safeguard the integrity of the Arizona Judiciary.

I. Mandate of the Commission and Grounds for Audit

The Arizona Commission on Judicial Conduct was established under **Article 6.1 of the Arizona Constitution** with the fundamental duty to preserve the integrity of the judiciary, protect the public, and promote public confidence in the judiciary by monitoring and enforcing the ethical standards set forth in the Code of Judicial Conduct. The Commission is the only oversight body in the State of Arizona with the authority to investigate judicial misconduct and ensure judicial officers discharge their duties with impartiality, integrity, and competence.

The grounds for this audit as described herein demonstrate the Commission's abject failure to remain in compliance with this constitutional mandate, thereby placing Arizona citizens, including children, in danger while knowingly ignoring egregious Judicial Misconduct.

II. Egregious Judicial Misconduct and Constitutional Violations (Maricopa County Superior Court Judge Charlene D. Jackson)

This is not a complaint about a judge's legal error or discretion, but about a deliberate, multi-faceted abuse of power and judicial process that violated countless families Constitutional Rights. There is a concerning pattern of egregious misconduct and ethical violations committed by Judge Jackson that the Commission not only failed to investigate but allegedly colluded with her to violate civil rights including participating in illegal surveillance and First Amendment Retaliation. Since early 2023, the Commission and other State agencies have been repeatedly placed on notice of Judge Jackson's willful and repeated deprivation of rights and her failure to follow the law, resulting in children being placed in harmful environments. To date, every state agency has failed to act.

Judge Jackson's refusal to follow the law, intentional manipulation of court procedures, collusion with opposing parties, and tampering with records, resulted in a fundamental denial of due process for me and my daughter, who Judge Jackson knowingly failed to protect. I experienced unbelievable procedural manipulation, records tampering, attorney misconduct and ex-parte abuse amounting to an abuse of process and obstruction of justice in my case.

The foundational legal maxim, **ubi jus, ibi remedium**—"where there is a right, there is a remedy"—is a core doctrine affirming the entitlement to effective judicial relief for every legal wrong. In this case, this essential maxim has been systematically nullified by the actions of Judge Charlene Jackson.

While I understand and respect that the Commission lacks authority to overturn judicial rulings or determine whether a judge has abused their discretion—and that it routinely declines to investigate complaints pertaining to judicial orders—this case presents a fundamentally different issue. It is not about a disagreement with a ruling or judicial discretion; it is about the deliberate abuse of process and procedural manipulation that foreclosed all avenues for lawful remedy and review. Judge Jackson actively and deliberately ensured that her legal wrongs could not be remedied. When a judge deliberately suppresses appellate access and uses void orders to impose sanctions, the issue is no longer judicial discretion—it is systemic denial of remedy and constitutional redress. Such abuse demands scrutiny. The Commission's failure to act in this context reflects a structural deficiency in oversight and a dangerous precedent for unchecked judicial power that has resulted in actual harm caused to litigants, including me and my daughter.

My entire legal nightmare stems from Judge Charlene Jackson's fundamental and initial lack of jurisdiction under the UCCJEA (Uniform Child Custody Jurisdiction and Enforcement Act), which means she never had the authority to rule in my case to begin with. Despite this fatal, foundational defect, Judge Jackson systematically violated the law by engaging in a pattern of affirmative conduct to block all redress. This includes her admitted, intentional maneuver of placing the improper jurisdictional ruling in a non-appealable minute order to preempt appellate review, and her subsequent decision to issue void orders after jurisdiction was already divested to the Court of Appeals. Judge Jackson then used those void orders to impose sanctions, warrants, and crippling financial penalties against me without due process. Her persistent refusal to correct these patent jurisdictional defects, coupled with her summary denial of every motion for relief without legal justification, rises to the level of deliberate indifference to the legal peril she created. By dismissing my complaints against this blatant, intentional obstruction, the Commission has sanctioned this systemic misconduct, ensuring that the judicial danger created by Judge Jackson is fully sustained, leaving me with no effective avenue for redress.

Gross Procedural Deficiency in UCCJEA Determination: The mandated UCCJEA conference, which requires a trial-like proceeding to establish jurisdiction, was conducted with only a few hours' notice via email where parties were instructed to mute their microphones,

lasted less than 15 minutes, and denied parties the right to submit evidence or testimony, resulting in a fundamental denial of due process.

Crucially, the jurisdictional ruling was issued in a single-sentence minute entry, entirely devoid of the explicit factual findings required by law. The failure to document specific findings on the record distinguished from appellate precedent (e.g., In re *Marriage of Wiener*, 2 CA-CV 2021-0071-FC; In re the *Matter of Eric Hubert*, 1 CA-CV 20-0362 FC; *Miley v. Phelps*, 1 CA-CV 22-0118 FC).

In my case, Judge Jackson did not document any findings on the record and her intentional issuance of a 1 sentence ruling placed in a non-appealable minute entry ensured I was effectively stripped of any legal ability to challenge the ruling on appeal.

Unlawful Protective Order Modification: During the procedurally deficient UCCJEA Conference, Judge Jackson removed our child from an existing California Domestic Violence Restraining Order without reviewing the original order, allowing testimony, or considering any documentary evidence—thereby placing a child and her mother in immediate danger. The California Judge who participated in this teleconference warned that the restrained party who we were legally protected from had continued to violate the Domestic Violence Restraining Order but there was nothing I could do because he intentionally evaded service from MCSO for over 6 months. Judge Jackson dismissed these concerns. She then closed the conference by declaring she wanted to discourage what she called "*games and SHIT,*" a remark directed at me. These actions violated fundamental procedural safeguards and undermined the protective order's intended purpose.

Intentional Obstruction of Appellate Review and Jurisdictional Violation: Judge Jackson made a clear admission during the subsequent Temporary Orders hearing, that she intentionally placed her ruling establishing jurisdiction in a non-appealable minute order, specifically to preempt any challenge via appeal.

Compromise of the Judicial Record: The For the Record ("FTR") audio recording omits Judge Jackson's admission regarding the deliberate use of a non-appealable order because the FTR was either trimmed or muted. Serious claims exist that other portions of FTR audio from proceedings in several cases assigned to Judge Jackson are missing, muted, or edited, which directly compromises the official record for any future review, potentially violating laws surrounding Tampering with Official Records, and violates litigants due process rights. The irregularities in the FTR audio can be seen as an admission that Jackson's misconduct is deliberate. If her inappropriate actions were by mistake, she wouldn't be taking steps to conceal it from FTR recordings.

Lack of Jurisdiction and Void Orders: Judge Charlene Jackson issued Temporary Orders after a Notice of Appeal had already been filed regarding the improper UCCJEA Conference, violating the **divestiture of jurisdiction** to the Court of Appeals. Notably, at the beginning of the Temporary Orders hearing, Judge Jackson admitted she would not be able to move forward with the case if a Notice of Appeal had been filed. Then, moments later, Judge Jackson admitted that she intentionally placed the jurisdictional ruling from the improper UCCJEA Conference in a non-appealable minute entry, so my Notice of Appeal was not valid to her, and she continued with the hearing. That inappropriate statement and admission of her intentionally violating my right to appeal the improper ruling is missing from the FTR audio which appears to have been muted. We have been trying to get the missing audio from FTR. Regrettably, there are other cases where attorneys and litigants have raised issues of their FTR recordings being muted, erased or trimmed in Judge Jackson's courtroom, creating the appearance of intentional records tampering. These jurisdictional defects were raised through multiple motions over the course of 2.5 years, all of which were summarily denied without findings or explanation. Arizona case law establishes that once jurisdiction is challenged, it must be affirmatively proven by the party asserting it (*A. Uberti and C. v. Leonardo*, 177 Ariz. 565, 569, 870 P.2d 1138, 1142 (1994)). The court cannot presume jurisdiction, nor can it proceed without resolving the challenge on the record, as orders issued without jurisdiction are void *ab initio* and must be vacated (*State v. Cramer*, 192 Ariz. 150, 153, ¶16, 962 P.2d 224, 227 (App. 1998)). Further, Arizona case law unequivocally holds that trial courts lack discretion to enforce or preserve judgments entered without jurisdiction. Such orders are legally void and must be vacated as a matter of law. In *State v. Cramer*, 192 Ariz. 150, 153 ¶16 (App. 1998), and *In re Marriage of Dorman*, 198 Ariz. 298, 301 ¶6 (App. 2000), the courts affirmed that any judicial action taken without proper jurisdiction is void ab initio and cannot be sustained under any circumstance. This principle safeguards the integrity of judicial proceedings and ensures that jurisdictional boundaries are strictly observed. I filed dozens of Motions raising these issues that were all summarily denied without explanation.

Unfortunately, it gets worse. Despite knowledge that the original orders were void for lack of jurisdiction at the time of issuance, Judge Jackson continued her abuse of power, issuing severe sanctions, including **warrants and financial penalties**, based upon these invalid prior orders. Judge Jackson further impeded my right to review by **summarily denying multiple motions challenging jurisdiction through non-appealable minute entries**, **without reasoning, findings or fact, or conclusions of law, thereby precluding meaningful appellate review.** This systematic blocking of all avenues for judicial review was reinforced by presiding judges, who declined to intervene, citing lack of authority to override another judge's rulings.

As a result of the judiciary's refusal to intervene, the Arizona Commission on Judicial Conduct was the only remaining oversight body available for me to seek redress. While I fully acknowledge and respect the separation of powers and the Commission's limited authority—it cannot alter judicial rulings or influence case outcomes—it does bear a statutory and constitutional duty to enforce the Arizona Code of Judicial Conduct. That duty includes investigating and addressing misconduct when a judge issues serious orders, including warrants and financial penalties, while knowingly lacking jurisdiction, simultaneously obstructing appellate review and summarily denying all motions for relief without reasoning.

The Code of Judicial Conduct requires judges to comply with the law, uphold due process, and act impartially with integrity. Judge Charlene Jackson's repeated refusal to follow jurisdictional rules and her issuance of void orders in a divested posture constitute clear violations of that Code. Formal complaints detailing these statutory and constitutional violations were submitted to the Commission via formal complaints and summarily dismissed.

The Commission's failure to investigate these due process violations, it's disregard for the rule of law, and its refusal to address the obstruction of appellate review—particularly in light of Judge Jackson's refusal to correct jurisdictional defects—reflect a profound breakdown in judicial oversight. This failure undermines public trust and highlights the urgent need for an independent audit of the Commission's disciplinary processes and accountability mechanisms.

Enabling Attorney Misconduct: Judge Charlene Jackson failed to exercise the judicial oversight required to preserve the integrity of proceedings before her court. Her inaction enabled opposing counsel, Attorney Caitlin L. Andrade, to submit pleadings containing materially false statements, internal contradictions, and deliberate omissions that facilitated her client's fraud upon the court.

A particularly egregious example involves Andrade's emergency request for extraordinary ex-parte relief—orders issued without notice to the opposing party and without any opportunity to be heard. I was not informed of the proceeding, was not present, and no transcript or official record exists documenting what occurred.

Less than three days after Judge Jackson issued Temporary Orders, Andrade filed an ex-parte Petition seeking Enforcement, Contempt, Sanctions, and a Warrant. In that filing, she admitted I had not been served with the underlying orders—a jurisdictional prerequisite for any contempt or enforcement action—and openly stated her intent to "*surprise*" me. Judge Jackson approved this procedurally defective request, thereby denying due process and endorsing Andrade's malicious exploitation of the emergency ex-parte process.

Six days prior, Andrade's client had filed a verified response in our California Domestic Violence Restraining Order case requesting we share equal (50/50) custody and parenting time—an admission that directly contradicts any belief of imminent danger to our child. Despite this sworn statement, Andrade petitioned Judge Jackson for emergency orders authorizing a warrant for our child with permission to enter private property, while knowingly misrepresenting facts and concealing her client's prior admission made under penalty of perjury.

As a licensed family law attorney, Caitlin L. Andrade was fully aware that her client's verified request for equal (50/50) custody and parenting time constituted a legal admission that he did not believe the opposing parent posed any danger to the child. Such a request is fundamentally incompatible with claims of imminent harm or risk. Andrade's decision to conceal this admission while simultaneously petitioning for emergency ex parte relief—including a warrant and sanctions—reflects a knowing misrepresentation of material facts and a deliberate attempt to mislead the tribunal.

Andrade had a legal duty under A.R.S. § 25-1058(3) to inform the court of the ongoing domestic violence proceedings in California. She intentionally concealed this information during the ex-parte hearing. Under Arizona Rule of Professional Conduct ER 3.3(a)(3) and (d), attorneys appearing in ex-parte proceedings are held to a heightened duty of candor and must disclose all material facts, even those unfavorable to their client. Andrade's deliberate omissions and misrepresentations violated this duty.

Critically, Andrade, a licensed and experienced attorney, also knew that Judge Jackson lacked jurisdiction to issue the orders in the first place. The case had been improperly retained following a flawed jurisdictional ruling and was subsequently divested to the Arizona Court of Appeals upon the filing of a Notice of Appeal. Andrade's continued filings and requests for relief—made while the trial court was divested of jurisdiction—demonstrate her awareness and exploitation of the court's unlawful exercise of authority and reinforces the appearance of collusion with Judge Jackson.

In subsequent pleadings, I submitted substantial evidence demonstrating that Attorney Caitlin L. Andrade's client engaged in extensive perjury and presented contradictory sworn statements across three separate courts. These contradictions included directly conflicting claims filed by Andrade herself in her own motions. Under Arizona Rule of Professional Conduct ER 3.3(a)(1) and (3), an attorney has a continuing and mandatory duty to take reasonable remedial measures—including withdrawal, correction, or disclosure—when they know that material evidence presented to the tribunal is false. Andrade's failure to correct or withdraw these proven falsehoods constitutes an ongoing violation of her duty of candor.

When I filed a motion specifically requesting that Andrade amend, correct, or strike her client's perjured statements—while providing documentary evidence of her contradictions—she responded by filing a Motion to declare me a Vexatious Litigant. This retaliatory tactic sought to silence legitimate objections to demonstrable misconduct and further obstructed the court's ability to address fraud and ethical violations.

Despite clear and documented evidence of Andrade's ethical breaches, procedural abuse, and her client's fraud upon the court, Judge Charlene Jackson failed to report the misconduct to the State Bar of Arizona, as required under Arizona Code of Judicial Conduct. Judge Jackson's deliberate inaction in the face of demonstrable ethical and legal violations constitutes a serious breach of judicial responsibility. Her refusal to act undermines institutional accountability, erodes public trust in the judiciary, and raises legitimate concerns of potential collusion with counsel.

Issuance of Substantively Void Orders and Findings Contrary to Evidence: Judge Jackson's Temporary Orders were predicated on a demonstrably false narrative that I "erratically" removed our child from preschool and took her to California without her father's knowledge or consent. This assertion is directly contradicted by her father's own sworn statements in the same filing, where he acknowledged awareness of our travel to California but claimed he believed the trip was temporary in nature for me to obtain medical care. It is self-evident that a child cannot simultaneously attend preschool in Arizona while in California with her mother. Moreover, our child was not enrolled in preschool at the time; I had taken her to tour multiple schools—a process her father declined to participate in.

This fabricated premise is further undermined by her father's own police report filed less than one week before initiating the domestic relations case. That report, supported by AXON bodycam footage and written statements, confirms his knowledge and acceptance that I had relocated to California with our child and that he intended to visit us. The report explicitly states that Erin and their child in common MOVED to California and that he planned to visit us soon.

Over time, his account shifted dramatically. He alternated between claiming my parents were caring for our child, asserting he had no idea where she was, and ultimately accusing me of kidnapping her. However, when he filed his first false police report with the Gilbert Police Department in August 2022, the investigation—which lasted until January 31, 2023—never included any allegation of abduction or kidnapping. If he genuinely believed our child had been abducted, such a claim would have been central to that investigation.

Eventually, my daughter's father retroactively alleged that I abducted our child on August 4, 2022. He placed her on the National Center for Missing and Exploited Children (NCMEC)

registry and illegally accessed my family members' phones—changing their voicemail greetings to the NCMEC hold message. These actions were not only deceptive but calculated harassment intended to inflict reputational harm and emotional distress. Notably, there was not a finding of Paternity on the record until February of 2023.

During the very period he claimed our child was missing and in danger, he was traveling extensively—vacationing in Hawaii, Mexico, California, Colorado, Idaho, and Utah. He got engaged, designed and built a new home, and continued living his life uninterrupted. This is not the behavior of a worried or grieving parent.

He never had any issue with me as a parent until he filed the domestic relations case which was riddled with flat out contradictory and unbelievable falsehoods. He left our daughter in my care every single day since birth. He frequently traveled without us, and I was out of state with our daughter so often that by the time our relationship ended, she had spent approximately half her life outside Arizona under my sole care, without her father present.

As a police officer, he is a mandated reporter—legally obligated to report suspected abuse, especially involving his own child. If he truly believed I posed a danger to our child, he would not have allowed me to care for her every need, unsupervised, daily, since birth. Is he admitting to violating the law by failing his duties as a mandated reporter? or committing endangerment of our child by leaving her with her "dangerous" mother daily? That isn't even a matter of law but of common sense.

The truth is, he despises children, was abusive to our daughter, and repeatedly abused me in her presence—something he admitted to under oath. His abuse escalated to such a degree that it led to the loss of our second child, our son, at approximately 20-weeks gestation. I was hospitalized in the ICU for a week with sepsis, disseminated intravascular coagulation (DIC), and organ failure after giving birth to my dead child. The trauma was catastrophic—physically, emotionally, and psychologically. As a result of the damage caused, I can no longer have children, and I have a permanent brain injury.

He filed the Domestic Relations case only after I refused to return to the abusive relationship for the final time. Since fall 2022, he has relentlessly weaponized the legal system—committing perjury, engaging in fraud upon the court, and repeatedly attempting to have false charges filed against me while identifying himself to numerous agencies as a SWAT operator to lend credibility to his false allegations. He finally succeeded, but not without warning: I stated in my first restraining order, filed in early September 2022, that he had threatened to falsely accuse me or have me arrested if I ever tried to leave and I feared false criminal charges or false arrest were coming. He made good on his promise.

With the support of a compromised judicial officer and his employer—who has a vested interest in discrediting me—he has used taxpayer resources as his personal piggybank to destroy my life and attempt to silence me. Their goal is to prevent me from testifying in lawsuits where I would have been a witness against my daughter's father. This is not just personal retaliation—it's institutional abuse of power, and it has come at the cost of my health, my safety, my reputation, and my ability to give my daughter siblings. More importantly, my daughter's safety is in jeopardy, and she is without her mother, the only parent who took care of her every need for the last 7 years, up until months ago when she was placed with her abusive father.

Further, there are laws that protect victims of Domestic Violence when they are fleeing their abuser. In my case, my daughter's father absolutely knew we moved, he just retroactively lied about it. In most cases where a victim of Domestic Abuse flees for their safety, they are legally allowed to lie to the other parent for their safety, and the State is supposed to protect them. Judge Jackson refuses to acknowledge those or any other domestic violence or child abuse related laws.

Judge Jackson falsely claimed in the Temporary Orders she issued in my case that no domestic violence was involved in our case, despite my sworn testimony and my opposing parties own pleadings, in which he argued I should be denied legal decision-making authority for allowing our child to witness repeated and substantial domestic violence committed by father against mother. This contradiction reveals a complete failure to consider the record and sworn statements regarding child safety and domestic abuse.

By disregarding the documented evidence of domestic violence altogether, Judge Jackson circumvented the mandatory child-protection provisions under A.R.S. § 25-403.03, which require specific findings and impose restrictions on legal decision-making and parenting time when domestic violence is established. Her actions resulted in the issuance of substantively void orders that placed our child at risk and reflect a knowing and intentional disregard for both the law and the safety of a child.

Unauthorized Judicial Insertion into Criminal Investigations and Retaliatory Prosecution: Judge Jackson admitted under oath to participating in investigations against me with the Mesa Police Department (MPD), despite the MPD lacking jurisdiction over my residence or Judge Jackson's residence. Judge Jackson admitted to inserting herself into these external investigations and, upon information and belief, acted as a confidential informant in the subsequent **felony custodial interference case** initiated against me—a case that will consume an estimated **one million dollars** in state resources. This alleged conduct represents a profound **misuse of judicial authority to leverage state resources** to secure a retaliatory outcome through criminal prosecution, based on court orders that are themselves procedurally void. The resultant

felony charges, which have placed our child with our abuser (who admitted in testimony that he did not take care of our child), demonstrate the devastating and retaliatory outcome of this collusion and abuse of authority. Judge Jackson never disclosed her participation in these investigations while presiding over my case, she waited to disclose this conflict until 4 months after recusal in her fraudulent restraining order against me.

Retaliatory Injunction: The most alarming incident is the **March 2025 Civil Harassment Restraining Order filed by Judge Jackson against me.** This action, filed four months after her recusal from my case and 4 months after the last alleged act of "*harassment*," is analyzed as a deliberate act of judicial retaliation and the weaponization of legal authority to suppress constitutionally protected speech while concealing her own misconduct. The timing was precisely calculated to interfere with my felony custodial interference case—which stems directly from the void and unconstitutional orders issued by Judge Jackson while she was secretly colluding with my opposing party and his employer, the Mesa Police Department—which she admitted to in her restraining order. Judge Jackson attempted to intimidate me into silence and to preemptively discredit me with false and defamatory allegations she filed under oath on a public record because she is aware her own misconduct will be presented at my custodial interference trial. This calculated move was intended to improperly influence judicial proceedings and prosecutorial decisions. Judge Jackson intended to chill my free speech as I have been legally exposing her egregious acts of misconduct and corruption for the last 2.5 years.

Concealed Bias and Collusion: Judge Jackson admitted under oath to concealing a bias and a conflict of interest while actively presiding over my case for well over a year. During this time, she coordinated surveillance and intervention with the Commission, court security, the Judicial Performance Review Board, my opposing party, opposing counsel, and my opposing party's employer (Mesa Police Department), demonstrating a systematic, inter-agency conspiracy to suppress dissent, intimidate me into silence, and secure a retaliatory outcome through abuse of the legal process. Judge Jackson's own restraining order confirmed the collusion I had suspected, which had previously been formally noted in complaints submitted to the Commission, Presiding Judges, The Governor, The Attorney General, and other government agencies. I also filed a Notice of Claim with the State of Arizona, and a Recall Petition with the Maricopa County Board of Elections. I am not some internet troll like Judge Jackson is trying to portray me as. I filed actual substantial complaints with evidence to nearly every agency in the State of Arizona, California and Federal Jurisdictions. It was not until all these agencies failed to act and I connected with dozens of other victims of Judge Jackson's that I began exposing her misconduct publicly online which is protected by the First Amendment.

III. Institutional Complicity and Abdication of Statutory Duties (The Arizona Commission on Judicial Conduct)

Evidence indicates a pattern of institutional complicity and systemic failures, demonstrating the Commission has abdicated its duty to police the judiciary and protect the public from harm.

Unauthorized Monitoring of a Citizen: Crucially, the Commission's authority is strictly limited to investigating and disciplining judges; it possesses no legal jurisdiction to surveil, investigate, or take action against a complainant. Despite this, sworn statements by Judge Jackson confirm that Commission personnel coordinated with her and court security to monitor my activities and communications after I expressed intent to contact the media regarding judicial misconduct. **This unlawful and unconstitutional surveillance exceeds the Commission's investigatory authority and represents a serious breach of impartial oversight. Furthermore, placing a citizen under surveillance for exercising their First Amendment rights is unconstitutional and violates several criminal statutes.**

To make matters worse, I reported what appeared to be a clear conflict of interest: **Judge Charlene Jackson was listed on the Maricopa County Superior Court docket as the judge assigned to a case involving her niece, Paige Jackson.** When I submitted a formal complaint to the Commission, their response essentially claimed they were unaware of the familial relationship. To substantiate my concern, I gathered publicly available evidence—photos, social media posts, and public records—showing Paige Jackson listed as an occupant at the same addresses as Charlene Jackson and photos they were both tagged in publicly on social media. This material was legally obtained and publicly accessible. If the Commission had investigated, I wouldn't have had to gather the evidence on their behalf.

According to Judge Jackson's restraining order, the Commission told her I was "cyberstalking" her. Judge Jackson never communicated this accusation to me directly, nor did she raise it in any formal proceeding or recuse herself from my case. In fact, I filed the same evidence in my custody case, and Judge Jackson responded only with summary denials. It was not until she filed the restraining order against me that I learned of these allegations.

Quoted from Jackson's restraining order: "I also received an email from the Judicial Conduct Commission advising me that the defendant filed judicial complaints against me and within the complaints the defendant threatened to go to the media about her case. Based on the threat and contents of her complaint they notified court security of the threats. Later that day, I spoke with court security about the nature of the defendants case and was advised they were monitoring her conduct and online presence for cyberstalking."

If Judge Jackson genuinely believed my actions constituted harassment or cyberstalking, she had a legal and ethical duty to recuse herself. She did not. Her decision to conceal a conflict and remain involved in the case for well over a year despite the alleged existence of investigations and these serious, concealed allegations, raises grave concerns about abuse of authority and the integrity of the entire proceeding. Her non-recusal, when she was allegedly also an aggrieved party, created an irremediable appearance of bias and conflict of interest, lending further weight to the need for a thorough, independent investigation into the relationships and actions of both Judge Jackson and the Commission on Judicial Conduct.

Suppression of Constitutional Rights: The Commission internally characterized my lawful media engagement as a **"threat,"** raising substantial concerns that it has improperly suppressed protected First Amendment rights and chilled legitimate criticism of the judiciary. Their unlawful surveillance of me, which Judge Jackson admitted to on a public record, has undoubtedly discouraged others from filing complaints, effectively chilling their speech.

Failure to Enforce Mandatory Recusal: The Commission was aware of the covert investigative operations and illegal surveillance targeting me yet failed to enforce the mandatory recusal requirements under the Code of Judicial Conduct. The Commission's prolonged indifference and inaction created an environment of impunity that directly emboldened Judge Jackson's conduct to escalate to the point where she filed a fraudulent and retaliatory injunction against me with the belief that she is above the law.

Contrasted Oversight: This failure is underscored by the Commission's willingness to act on minor issues, contrasting sharply with alleged inaction on severe abuses. On June 9, 2025, the Commission issued only an advisory letter [1] to Judge Jackson concerning a self-reported delay in a ruling—an incident for which she made several excuses, blaming court staff and her caseload rather than accepting judicial responsibility. This willingness to act on a minor administrative delay contrasts with its failure to address profound and systemic issues of concealed bias, collusion, retaliation, and constitutional violations including knowingly placing children in danger.

Public Accountability: The systemic failure of oversight has become a matter of public concern, as evidenced by a public petition[2] with over 2,700 signatures urging investigation or removal of Judge Jackson. Arizona is being watched closely by all 50 states as it proudly

[1] See https://azcjc.azcourts.gov/portals/5/137/reports/2025/25-036.pdf
[2] See https://www.change.org/p/investigate-remove-judge-charlene-jackson-for-alleged-negligence-and-misconduct

positions itself as the nation's leader in Family Court Reform. Instead of leading by good example, with demonstrated transparency and accountability, the State is allowing itself to be publicly disgraced by the misconduct and corruption taking center stage—committed by several notoriously problematic judges including the Hon. Charlene Jackson. Judge Jackson's conduct is an embarrassing stain on Arizona's judiciary. As a representative of the state's judicial branch, her actions reflect not only on her courtroom but on the integrity of the entire system.

IV. Basis for Review of Potential Statutory and Civil Rights Violations

Official Misconduct and Conspiracy: The coordination between Judge Jackson and Commission staff in conducting surveillance and retaliation raises potential violations of Arizona criminal statutes, including official misconduct and stalking, as well as state and federal conspiracy statutes.

Judicial Misuse in Personal Capacity: Judge Jackson filed the restraining order against me in her personal capacity but invoked her judicial title and mentioned other Judicial Officers (such as former Presiding Judge Bruce Cohen) to lend credibility to false claims she submitted to the court under oath. Judge Jackson involved her colleagues as witnesses in a retaliatory civil filing where she committed blatant perjury and abuse of process. Judge Jackson isn't only endangering children and families in her courtroom. She has recklessly and carelessly endangered her own colleagues, subjecting them to potential civil or criminal liability and reputational harm by including them in her unlawful activities. Despite Judge Jackson inappropriately identifying herself as a judicial officer to lend credibility to the false statements she made in her application for her restraining order; she filed it in her personal capacity therefore is no longer protected by judicial immunity.

Mitigation of State Liability: The State of Arizona has known about the misconduct and potential criminal conduct committed against citizens by Judge Charlene Jackson since at least January of 2023 and has chosen to act with a deliberate indifference to a known and obvious danger. Judge Jackson has violated parents and children's constitutional rights and knowingly placed dozens of children, including mine, in a State-Created danger. The Commission's repeated failure to investigate credible complaints, combined with its role in enabling and participating in retaliatory conduct demonstrates deliberate indifference to Constitutional Rights. This exposes the State of Arizona to liability under 42 U.S.C. § 1983 for violations of the Due Process Clause, the First Amendment, the Fourth Amendment, and the Fourteenth Amendment. Additionally, the Presiding Judges of the Maricopa County Superior Court have failed in their supervisory and

training responsibilities of Judge Jackson. Despite receiving multiple formal complaints, motions for change of judge, and documented evidence of misconduct, Presiding Judges have taken no corrective action. Their failure to report Judge Jackson to the Commission, as required under the Arizona Code of Judicial Conduct, constitutes a breach of their mandatory ethical duties and contributes to the systemic deprivation of rights. This institutional negligence further implicates the judiciary in a broader failure to protect the public from known misconduct and judicial abuse while potentially implicating them in the criminal acts committed by Judge Jackson in her professional and personal capacity.

V. Requested Audit and Recommended Actions

I respectfully urge the Joint Legislative Audit Committee (JLAC) to authorize the Auditor General to conduct a special audit and financial investigation into the Arizona Commission on Judicial Conduct. This audit is necessary to establish a factual record of the Commission's operational failures and potential misuse of public funds and may warrant mandatory criminal referral to the Office of the Attorney General or other appropriate investigative agency.

Allegations have surfaced that the Commission placed me, a complainant, under surveillance after I threatened to speak to the media about my case. This raises serious concerns about retaliatory conduct, illegal monitoring of complainants, intentional violation of Constitutional Rights by a state funded agency, and systemic abuse of authority that taxpayers are funding. It is imperative to determine the scope of such misconduct and whether other complainants have been similarly targeted.

I have submitted multiple complaints detailing egregious misconduct—including conduct I believe constitutes criminal violations of both Arizona and Federal statutes—yet the Commission has taken no action to protect the public from Judge Charlene Jackson.

The integrity of Arizona's judiciary and the responsible stewardship of taxpayer resources demand immediate and independent review. The Commission's failure to enforce judicial ethics, investigate credible complaints, and protect vulnerable citizens, constitutes a misuse of public authority and resources. This is not merely administrative failure. It is a systemic breach of public trust that has caused actual harm to me, my daughter and countless other families. An external audit is not only warranted—it is essential.

Conclusion

The Arizona Commission on Judicial Conduct, by repeatedly ignoring reports of judicial retaliation and failing to enforce the mandatory Code of Judicial Conduct, created a systemic failure of oversight. Ongoing concerns surrounding the Commission's failures and lack of transparency have been featured in media reports and mentioned by State Representatives in the past, who took no meaningful action after the news cycle was over.

Arizona families deserve judicial officers who are fair, impartial, and committed to upholding the law without violating their Constitutional Rights. Judge Jackson's characterization of lawful dissent—including the filing of formal complaints and the public exposure of her misconduct—as "harassment" is terrifying and underscores the urgent need for her immediate removal from the bench.

The latest complaint filed on my behalf with the Commission on Judicial Conduct on October 6, 2025, includes genuine concerns of future retaliation. I am not confident that the Commission or the State of Arizona will protect us from additional retaliation. I fear for the safety of my daughter and my family.

I believe this audit is necessary for the people of Arizona. It is my civic duty as an American to speak out against injustice, and my unwavering responsibility as a mother to protect all children from harm, including my own. Despite the urgent need for an investigation and audit into the Commission and the Hon. Charlene Jackson, I am risking my safety and my freedom by submitting this request.

There was a time when the psychological toll of Judge Charlene Jackson's misconduct became physically unbearable, and I became sick. The fear of what she might do to me—legally, personally, and as a mother and how that would affect my child—triggered anxiety and panic attacks that left me unable to breathe, speak, or function. These episodes escalated until I suffered a full-blown panic attack while speaking publicly back in June. I lost the ability to form sentences. I was overwhelmed by fear. I ended up hospitalized. I was crippled with fear and became physically ill because of her.

Even as I recovered in silence, other victims kept finding me. Individuals still trapped in Judge Jackson's courtroom—terrified of retaliation against themselves or their children—reached out because they needed help. They needed someone to speak. Their courage gave me mine. It was their stories, their desperation, and the repeated violations of their children's rights that gave me the strength to break my silence and reclaim my voice.

My advocacy is not optional. It is a direct response to injustice. It is rooted in survival, in solidarity with other victims, and in the unwavering belief that the Constitution protects our right to speak, to petition, and to demand accountability. My rights are not negotiable, and my voice is not up for censorship. I do not live under authoritarian rule, and I'm certainly not auditioning for anyone's dictatorship fantasy. I will not be intimidated, I will not be silenced, and I will not be bullied into relinquishing my constitutional rights.

No judge in the United States of America should hold the perverse belief that constitutionally protected oversight and criticism amount to harassment. If Judge Jackson had followed the law and upheld her duty to protect vulnerable individuals—including the defenseless children who are tragically subjected to the civil rights crisis unfolding in her courtroom—there would be nothing for me to expose. Her attempt to silence me through a fraudulent injunction is not merely a personal attack; it is a direct threat to all family court litigants and a broader assault on the democratic principles that underpin our justice system. The fact that the only oversight agency in the state is finding nothing wrong with this behavior from a sitting judge is beyond concerning.

Judge Jackson—and anyone who participates in her efforts to harass, stalk, silence, or intimidate me—is a direct threat to democracy. When a judge uses her office to retaliate against a litigant for speaking the truth, she doesn't just violate the law. She undermines the very foundation of justice. Every law enforcement official, judicial officer, commission member, and state agency that has turned a blind eye is not just complicit. They are part of the problem.

This is not a rogue custody dispute; it is a civil rights crisis. Judge Jackson's action—submitting an application for an injunction against harassment that targets lawful, constitutionally protected advocacy to conceal her own misconduct—and the fact that another judicial officer approved it, is proof of institutional decay within Arizona's judiciary. This system is more invested in shielding a judge who violates the law, treats the Constitution as optional, and knowingly places children with abusers and sexual offenders than in upholding justice.

The fact that thousands of parents, grandparents and their families are fighting for basic civil rights in 2025 should reflect as a shameful embarrassment on specific leaders of Arizona who have chosen to ignore our repeated pleas for help.

I know what I'm up against. My continued efforts including requesting audits, contacting elected officials, engaging with the media, and participating in federal investigations, have made me a target. I am facing threats, harassment, and retaliation that put my safety and freedom at risk. And yet, here I am. Still standing. Still speaking. You cannot comply your way out of corruption. Silence is complicity, and I'm fresh out of patience. I'm done tiptoeing around egos

while children are being harmed, and judges are out here acting like they're auditioning for lead dictator of Family Court. I'm here to make misconduct impossible to ignore. I will relentlessly pursue accountability until every child is safe, every perpetrator is held accountable, and every official is reminded: you are not above the law.

I have attached the latest complaint filed on my behalf with the Commission on Judicial Conduct here and one of the previously dismissed complaints here.

Thank you for your prompt attention to this critical matter. I stand ready to provide all documentation and records necessary for the launch of this investigation.

Respectfully,

Erin Gerlach